

Child Protective Proceedings Benchbook

A Guide to Abuse and Neglect Cases
REVISED EDITION



Michigan Judicial Institute

By Tobin L. Miller, J.D.

Michigan Supreme Court

- Hon. Maura D. Corrigan, *Chief Justice*
- Hon. Michael F. Cavanagh, Hon. Elizabeth A. Weaver, Hon. Marilyn Kelly, Hon. Clifford W. Taylor, Hon. Robert P. Young, Jr., Hon. Stephen J. Markman, *Justices*
- John D. Ferry, Jr., *State Court Administrator*

Michigan Judicial Institute Staff

- Dawn F. McCarty, *Director*
- Anne M. DeMarco, *Program Assistant*
- Vickie L. Eggers, *Distance Learning Specialist*
- Phoenix Jane Hummel, *Research Attorney*
- Sheila J. Kallish, *Program Assistant*
- Denise D. Kruger, *Administrative Assistant*
- Mary Ann McDaid, *Multimedia Specialist*
- Tobin L. Miller, *Publications/Program Manager*
- Tricia A. Shaver, *Program Assistant*
- Peter C. Stathakis, *Program Manager*
- Jennifer D. Warner, *Research Attorney*
- Cathy Weitzel, *Judicial Education /Conference Center Coordinator*

The research done on this benchbook is current through December 1, 2003. This benchbook is not intended to be an authoritative statement by the Justices of the Michigan Supreme Court regarding any of the substantive issues discussed. However, it does represent the consensus of the author and the advisory committee members regarding these issues.

Acknowledgments

This revised edition of the *Child Protective Proceedings Benchbook* was produced in December 2003 to bring the text up to date and improve its organization. The first edition of the *Child Protective Proceedings Benchbook* was funded by the Court Improvement Program, the State Court Administrative Office (SCAO). The Michigan Judicial Institute (MJJI) thanks the Court Improvement Program and SCAO for their generous support.

Although this benchbook is primarily intended for use by judges and referees presiding over child protective proceedings in the Family Division of Circuit Court, it also contains information useful to all participants in the child protection system in Michigan. It is hoped that this benchbook will be of use to anyone who participates in that system, and that this benchbook will help those dedicated to improving the lives of Michigan's children.

Work on the first edition of this benchbook was overseen by an Advisory Committee comprised of judges, referees, court administrators, social services administrators, prosecutors, private attorneys, and other experts involved in the child protection system in Michigan. Advisory Committee members assisted the author in selecting topics for discussion and organizing the material in the benchbook. They also spent many hours reviewing those portions of the text that addressed their areas of expertise. The Michigan Judicial Institute gratefully acknowledges the time, helpful advice, and expertise contributed by the Advisory Committee members. The Advisory Committee members for the first edition were:

- ◆ Hon. Michael J. Anderegg
Chief Judge
Marquette County Probate Court
- ◆ Ron Apol
Supervisor/Hearing Referee
Permanency Planning Department
Family Division
17th Circuit Court
Kent County
- ◆ William P. Bartlam
Deputy Court Administrator
6th Circuit Court
Oakland County
- ◆ Nannette Bowler
Former Executive Director and
Counsel
Children's Commission
Office of Lieutenant Governor
Director, Chance at Childhood
Law and Social Work Initiative
Michigan State University
- ◆ Hon. Joseph A. Costello, Jr.
Circuit Judge
Assigned to Family Division
38th Circuit Court
Monroe County
- ◆ David H. Dorr
Referee, Family Division
17th Circuit Court
Kent County
- ◆ Jeffrey R. Fink
Assistant Prosecuting Attorney
Kalamazoo County Prosecutors
Office
- ◆ Michael D. Foley
Executive Director
Children's Charter of the Courts of
Michigan, Inc.
- ◆ Brien R. Fortino
Assistant Prosecuting Attorney
Eaton County Prosecutors Office
- ◆ Thomas P. Fruechtenicht
Attorney at Law
Lansing
- ◆ Linda Glover
Coordinator
Court Improvement Program
State Court Administrative Office
- ◆ Richard A. Kerbawy
Referee, Family Division
30th Circuit Court
Ingham County
- ◆ Susan L. Leahy
Special Assistant to the Director for
Child Welfare
Family Independence Agency
- ◆ Hon. Frances Pitts
Probate Judge
Assigned to Family Division
3d Circuit Court
Wayne County
- ◆ Thomas C. Robison
Court Administrator
56th Circuit Court
Eaton County
- ◆ Hon. John P. Steketee
Chief Judge of Family Division
17th Circuit Court
Kent County
- ◆ Hon. Susan E. Vandercook
Chief Judge of Family Division
4th Circuit Court
Jackson County
- ◆ Frank E. Vandervort
Program Manager
Michigan Child Welfare Law
Resource Center
University of Michigan Law School
- ◆ George Zulakis
Attorney at Law
Baird & Zulakis, PC
Okemos

The Michigan Judicial Institute was created in 1977 by the Michigan Supreme Court. MJI is responsible for providing educational programs and written materials for Michigan judges and court personnel. In addition to the formal seminar offerings, MJI is engaged in a broad range of publication activities, services, and projects that are designed to enhance the professional skills of all those serving in the Michigan court system. MJI welcomes comments and suggestions. Please send them to: **Michigan Judicial Institute, P.O. Box 30205, Lansing, MI 48909, (517) 373-7171.**

Child Protective Proceedings Benchbook Chapters

CHAPTER 1: Introduction

CHAPTER 2: Reporting & Investigating Suspected Child Abuse & Neglect

CHAPTER 3: Obtaining Protective Custody of a Child

CHAPTER 4: Jurisdiction, Venue, & Transfer

CHAPTER 5: Notice & Time Requirements

CHAPTER 6: Petitions & Preliminary Inquiries

CHAPTER 7: Preliminary Hearings

CHAPTER 8: Placement of a Child

CHAPTER 9: Pretrial Proceedings

CHAPTER 10: Pleas of Admission or No Contest

CHAPTER 11: Common Evidentiary Issues in Child Protective Proceedings

CHAPTER 12: Trials

CHAPTER 13: Initial Dispositions

CHAPTER 14: Paying the Costs of Child Protective Proceedings

CHAPTER 15: Review of Referee's Recommended Findings & Conclusions

CHAPTER 16: Dispositional Reviews & Review Hearings

CHAPTER 17: Permanency Planning Hearings

CHAPTER 18: Hearings on Termination of Parental Rights

CHAPTER 19: Post-Termination Review Hearings

CHAPTER 20: "Child Custody Proceedings" Involving Indian Children

CHAPTER 21: Appeals

CHAPTER 22: Family Division Records

Subject Matter Index

Citation Index

Case Citation Index

Table of Contents

Chapter 1: Introduction	1
1.1 Summary of Benchbook Contents	1
1.2 Table Summarizing Michigan Statutes and Court Rules Related to Child Protective Proceedings	4
1.3 Applicable Federal Law and Regulations	7
1.4 Application of the Michigan Rules of Evidence	10
Chapter 2: Reporting & Investigating Suspected Child Abuse & Neglect	11
2.1 Definitions Under the Child Protection Law	12
2.2 Mandatory Reports of Suspected Abuse or Neglect	22
2.3 Non-Mandatory Reports of Suspected Abuse or Neglect	24
2.4 Child Abuse Reports by Judges Under the Parental Rights Restoration Act	24
2.5 “Reasonable Cause to Suspect” Abuse or Neglect	25
2.6 Time Requirements for Mandatory Reports of Suspected Abuse or Neglect	27
2.7 Investigation and Referral Requirements	27
2.8 Required Cooperation Between FIA and Law Enforcement Officials	30
2.9 Required Use of Protocols	31
2.10 Using Videorecorded Statements	32
2.11 Investigation and Custody Requirements When a Child Is Brought to a Hospital	33
2.12 Required Procedures for Contacting a Child at School	34
2.13 Interviewing a Child Out of the Presence of a Suspected Abuser	35
2.14 The Use of Court Orders in Investigating Suspected Abuse or Neglect	35
2.15 Constitutional Requirements for Reporting and Investigating Suspected Child Abuse or Neglect	35
2.16 FIA Access to Confidential Records to Investigate Suspected Abuse or Neglect	44
2.17 FIA Registry of Reports of Abuse and Neglect	47
2.18 Access to FIA’s Registry	48

2.19	Required Response by the FIA Following Investigation	52
2.20	Who May File a Petition Seeking Court Jurisdiction	54
2.21	Time Requirements for Filing a Petition in Cases Involving Severe Physical Injury or Sexual Abuse	55
2.22	Required Request for Termination of Parental Rights at Initial Dispositional Hearing	55
2.23	Liability and Immunity	59

Appendix: “CPS Policy Best Practice Guidelines Domestic Violence”

Chapter 3: Obtaining Protective Custody of a Child 69

3.1	Obtaining Temporary Protective Custody of a Child Without Court Order	69
3.2	Obtaining Protective Custody of a Child With Court Order	70
3.3	Required Investigation Before Placing a Child With Relatives Pending Preliminary Hearing	72
3.4	Required Procedures After a Child Is in Protective Custody	72
3.5	Time Requirements for Preliminary Hearing When a Child Is in Protective Custody	73
3.6	Temporary Custody of a Child Admitted to a Hospital	74
3.7	Ordering Medical Treatment for a Child	74
3.8	Taking Temporary Protective Custody of a Child Pursuant to the Safe Delivery of Newborns Law	81

Chapter 4: Jurisdiction, Venue, & Transfer 85

4.1	Subject Matter Jurisdiction and Personal Jurisdiction	86
4.2	Statutory Bases of Personal Jurisdiction	90
4.3	Definition of “Nonparent Adult”	92
4.4	Temporary Neglect Is Sufficient for Court to Take Jurisdiction	93
4.5	Parental Culpability Is Not Required for Court to Take Jurisdiction of a Child Because of an Unfit Home	93
4.6	Anticipatory Neglect or Abuse Is Sufficient for Court to Take Jurisdiction of a Newborn Child	94
4.7	Case Law Defining Culpable Failure or Refusal to Provide Support or Care (“Neglect”)	95
4.8	Case Law Defining “Substantial Risk of Harm” to a Child’s Mental Well-Being (“Emotional Neglect”)	96
4.9	Case Law Defining “Abandonment”	97
4.10	Case Law Defining “Without Proper Custody or Guardianship”	97
4.11	Case Law Defining “Unfit Home Environment”	100
4.12	Court’s Authority to Take Jurisdiction Over a Child Following the Appointment of a Guardian	101

4.13	Waiver of Jurisdiction in Divorce Proceedings	104
4.14	Procedures for Handling Cases When Child Is Subject to Prior or Continuing Jurisdiction of Another Court in Michigan	105
4.15	Procedures for Handling Interstate Cases	107
4.16	Continuation of Family Division Jurisdiction After Child Becomes 18 Years of Age	112
4.17	Family Division Jurisdiction and Authority Over Adults	113
4.18	Family Division Jurisdiction of Contempt Proceedings	113
4.19	Change of Venue	114
4.20	Transfer of Case to County of Residence	115
4.21	Responsibility for Costs of Disposition	116

Chapter 5: Notice & Time Requirements 117

5.1	Service of Process in Child Protective Proceedings	117
5.2	Establishing Paternity	125
5.3	Issuance and Service of Summons	130
5.4	Notice of Hearings in Child Protective Proceedings	133
5.5	Persons Entitled to Notice of Hearings	135
5.6	Special Notice Provisions for Physicians	139
5.7	Special Notice Provisions for Incarcerated Parties	140
5.8	Waiver of Defects in Service of Process or Notice of Hearing	142
5.9	Subpoenas	143
5.10	Proof of Service	144
5.11	Judgments and Orders	146
5.12	Adjournments and Continuances in Child Protective Proceedings	146
5.13	Table of Time and Notice Requirements in Child Protective Proceedings	147

Appendix: “Absent Parent Protocol: Finding and Notifying Non-custodial Parents in Child Protective Cases”

Chapter 6: Petitions & Preliminary Inquiries 165

6.1	Petitions to Initiate Child Protective Proceedings	165
6.2	Persons Who May Submit a Petition to Court	166
6.3	Prosecuting Attorney’s Role	166
6.4	Required Contents of Petitions	167
6.5	Required Information About Other Court Matters Involving Members of Same Family	169

6.6	Preliminary Inquiries	170
6.7	Court's Options Following Preliminary Inquiries	171

Chapter 7: Preliminary Hearings 173

7.1	When a Preliminary Hearing Must Be Conducted	174
7.2	Time Requirements for Preliminary Hearings	174
7.3	Adjournments of Preliminary Hearings	174
7.4	Respondents' Right to Counsel	175
7.5	Appointment of Lawyer-Guardians Ad Litem for Children	184
7.6	Powers and Duties of Lawyer-Guardians Ad Litem	186
7.7	Appointment of Attorney for the Child	189
7.8	Appointment of Guardians Ad Litem	190
7.9	Appointment of Court-Appointed Special Advocates (CASAs)	190
7.10	Required Procedures at Preliminary Hearings	191
7.11	Petition Authorization	193
7.12	Procedures Following Petition Authorization	194
7.13	Requirements to Order Alleged Abuser From the Child's Home	194
7.14	Orders Affecting "Nonparent Adults"	197
7.15	Warrantless Arrest of Persons Violating Orders Removing Them From Child's Home	198

Appendix: Excerpt from "Lawyer Guardian ad Litem Protocol"

Chapter 8: Placement of a Child 201

8.1	Requirements to Release or Place a Child Pending Trial	202
8.2	Type of Placements Available	204
8.3	Required Release of Information When a Child Is Placed in Foster Care	208
8.4	Required Medical Examination of a Child Placed in Foster Care	208
8.5	Requirements for Establishing "Medical Passports"	210
8.6	Required Advice Concerning Initial Service Plans	210
8.7	Parenting Time or Visitation	212
8.8	Order for Examination or Evaluation of Parent, Guardian, Legal Custodian, or Child	214
8.9	Required Findings When Placement Is Ordered	214
8.10	Required "Reasonable Efforts" Finding	215
8.11	Review of Placement and Initial Service Plan	218
8.12	Restrictions on Changes of a Child's Foster Care Placement	220
8.13	Required Notices Prior to Changes of a Child's Foster Care Placement	221

8.14	Required Procedures for Appeals of Changes of Foster Care Placements	222
8.15	Appeals to Family Division or MCI Superintendent of Changes of Foster Care Placements	222
8.16	Emergency Change in a Child's Foster Care Placement	223
8.17	Placement of a Child Pursuant to the Safe Delivery of Newborns Law	226

Chapter 9: Pretrial Proceedings **233**

9.1	Pretrial Conferences	233
9.2	Discovery	233
9.3	Motion Practice	235
9.4	Motions to Close Proceedings to the Public	238
9.5	Demand for Jury Trial or Trial by Judge	238

Chapter 10: Pleas of Admission or No Contest **241**

10.1	When a Respondent May Make a Plea of Admission or No Contest	241
10.2	Required Advice of Rights and Possible Disposition	242
10.3	Requirement of a Knowing, Understanding, Voluntary, and Accurate Plea	243
10.4	Special Requirements for No Contest Pleas	244
10.5	Records of Plea Proceedings	244
10.6	Withdrawal of Pleas	244
10.7	Combined Adjudicative and Dispositional Hearings	245

Chapter 11: Common Evidentiary Issues in Child Protective Proceedings **247**

11.1	Constitutional Issues	248
11.2	Table Summarizing Application of the Rules of Evidence and Standards of Proof	250
11.3	Abrogation of Privileges in Child Protective Proceedings	257
11.4	Admissibility of Statement by a Child Under MCR 3.972(C)	258
11.5	Exceptions to the "Hearsay Rule" Commonly Relied Upon in Child Protective Proceedings	260
11.6	Child Witnesses Are Not Presumed Incompetent	276
11.7	In-Camera Conferences	276
11.8	Alternative Procedures to Obtain Testimony of Child or Developmentally Disabled Witnesses	277
11.9	"Other Acts" Evidence	282
11.10	Evidence Admitted at a Hearing May Be Considered at Subsequent Hearings	289

11.11 Expert Testimony in Child Protective Proceedings	289
11.12 Requirements for the Use of Photographs	296
11.13 Prohibition Against Calling Lawyer-Guardian Ad Litem as Witness	299

Chapter 12: Trials 301

12.1 Trials in Child Protective Proceedings	301
12.2 Time Requirements	302
12.3 Parties Who May Be Present at Trial	303
12.4 Rules of Evidence and Standard of Proof	303
12.5 Jury Procedures	303
12.6 Jury Instructions	305
12.7 Lawyer-Guardian ad Litem Recommendation	305
12.8 Motions for Directed Verdict in Jury Trials	305
12.9 Taking the Verdict in Jury Trials	306
12.10 Court's Authority to Call Additional Witnesses	306
12.11 Findings of Fact and Conclusions of Law by Judge or Referee	307
12.12 Records of Proceedings at Adjudicative Hearings	308
12.13 Motions for Rehearing or New Trial	308

Appendix: Child Protection Jury Instructions, Judge Donald S. Owens, Michigan Court of Appeals, May 1, 2003

Chapter 13: Initial Dispositions 311

13.1 The Dispositional Phase of Child Protective Proceedings	312
13.2 Purpose of Initial Dispositional Hearings	312
13.3 Time Requirements	313
13.4 Parties Who May Be Present at Initial Dispositional Hearings	313
13.5 Rules of Evidence and Reports at Initial Dispositional Hearings	313
13.6 Required Case Review and Testimony by Child's Physician	314
13.7 Case Service Plans	316
13.8 Required "Reasonable Efforts" Determination	318
13.9 Dispositional Options Available to Court	320
13.10 Orders to Comply With Case Service Plans	325
13.11 Provision of Records to Child's Foster Care Provider	326
13.12 Scheduling Review Hearings	326
13.13 Revising Case Service Plans	327
13.14 Supplemental Orders of Disposition	327

13.15 Additional Allegations of Abuse or Neglect	327
--	-----

Chapter 14: Paying the Costs of Child Protective Proceedings 329

14.1 Federal, State, and County Sources of Funding	329
14.2 Orders for Reimbursement of the Costs of Care or Services When a Child Is Placed Outside the Home	334
14.3 Orders for Reimbursement of the Costs of Service When a Child Is Placed in the Child's Own Home	338
14.4 Using a Child's Governmental Benefits to Reimburse the Costs of Care	339
14.5 Using Wage Assignments to Pay Reimbursement Orders	339
14.6 Orders for Reimbursement of Attorney and Lawyer-Guardian ad Litem Fees	340

Appendix: Funding Source Charts

Chapter 15: Review of Referee's Recommended Findings & Conclusions 341

15.1 Hearings a Judge Must Conduct	341
15.2 Hearings a Referee May Conduct	342
15.3 Referees' Authority	342
15.4 Required Summary of Testimony and Recommended Findings and Conclusions	344
15.5 Advice of Right to Seek Review of Referee's Recommended Findings and Conclusions	344
15.6 Judicial Review of Referee's Recommended Findings and Conclusions	344
15.7 Procedural Requirements	345
15.8 Time Requirement for Judge's Consideration of Request	345
15.9 Stay of Proceedings	346
15.10 Standard of Review	346
15.11 Remedies	346

Chapter 16: Dispositional Reviews & Review Hearings 347

16.1 Time Requirements for Review Hearings When a Child Is in Foster Care	348
16.2 Required Procedures and Rules of Evidence at Dispositional Review Hearings	350
16.3 Required Review of Progress Toward Compliance With the Case Service Plan	351
16.4 Modification of the Case Service Plan	352
16.5 Amended or Supplemental Orders of Disposition	353
16.6 Records of Dispositional Review Hearings	353

16.7	Progress Reviews of Children at Home	353
16.8	Requirements to Order a Change in Placement When a Child Is at Home	354
16.9	Emergency Removal of a Child Placed at Home	355

Chapter 17: Permanency Planning Hearings 357

17.1	Purpose of Permanency Planning Hearings	357
17.2	Requirements of the Child’s Supervising Agency	359
17.3	Time Requirements	362
17.4	Required Procedures and Rules of Evidence at Permanency Planning Hearings	364
17.5	Court’s Options Following Permanency Planning Hearings	366
17.6	Required Request for Termination of Parental Rights Under Federal Law	370

Chapter 18: Hearings on Termination of Parental Rights 373

18.1	When the Court May Consider a Request for Termination of Parental Rights	374
18.2	Petition Requirements	375
18.3	Standing to File Petition Requesting Termination of Parental Rights	376
18.4	“Respondent” Defined	377
18.5	No Right to Jury Trial	378
18.6	Suspension of Parenting Time	378
18.7	Standard and Burden of Proof Required to Establish Statutory Basis for Termination	378
18.8	Requirements for the “Best Interest” Step	379
18.9	Termination of Parental Rights at Initial Dispositional Hearing	382
18.10	Termination of Parental Rights on the Basis of New or Different Circumstances	383
18.11	Termination of Parental Rights in Other Cases	386
18.12	Required Findings by the Court	388
18.13	Required Advice of Rights	389
18.14	Voluntary Termination of Parental Rights	390
18.15	Termination of One Parent’s Rights Under the Juvenile Code	390
18.16	Effects of Termination of Parental Rights	391
18.17	An Overview and History of §19b(3) of the Juvenile Code	392
18.18	Termination on the Grounds of Desertion—§19b(3)(a)	394
18.19	Termination on the Grounds of Physical Injury or Sexual Abuse—§19b(3)(b)	396
18.20	Termination on the Grounds of Failure to Rectify Conditions Following the Court’s Assumption of Jurisdiction—§19b(3)(c)	400
18.21	Termination on the Grounds of Substantial Failure to Comply With Limited Guardianship Placement Plan—§19b(3)(d)	406

18.22 Termination on the Grounds of Substantial Failure to Comply With Court-Structured Guardianship Placement Plan—§19b(3)(e)	406
18.23 Termination on the Grounds of Parent’s Failure to Support, Visit, Contact, and Communicate With Child Who Has Guardian—§19b(3)(f)	407
18.24 Termination on the Grounds of Failure to Provide Proper Care or Custody—§19b(3)(g)	408
18.25 Termination on the Grounds of Imprisonment of the Parent—§19b(3)(h)	413
18.26 Termination on the Grounds of Prior Termination of Parental Rights to Siblings—§19b(3)(i)	415
18.27 Termination on the Grounds of Reasonable Likelihood of Harm to Child—§19b(3)(j)	416
18.28 Termination on the Grounds of Serious Abuse of Child or Sibling—§19b(3)(k)	417
18.29 Termination on the Grounds of Prior Involuntary Termination of Parental Rights to Another Child—§19b(3)(l)	418
18.30 Termination on the Grounds of Prior Voluntary Termination of Parental Rights to Another Child—§19b(3)(m)	419
18.31 Termination on the Grounds of Conviction of a Serious Offense—§19b(3)(n)	419

Chapter 19: Post-Termination Review Hearings 421

19.1 Purpose of and Time Requirements for Post-Termination Review Hearings	421
19.2 Required Findings and Conclusions Following Review Hearings	422
19.3 “Legal Risk Placement”	423
19.4 Termination of Jurisdiction	424

Chapter 20: “Child Custody Proceedings” Involving Indian Children 427

20.1 General Requirements of the Indian Child Welfare Act	428
20.2 Purpose of the Indian Child Welfare Act	428
20.3 Determining Whether a Child Is an “Indian Child”	429
20.4 Notice of Proceedings to Parent and Tribe or Secretary of Interior	431
20.5 Transfer of Case to Tribal Court	435
20.6 Additional Time Required to Prepare for Proceedings	438
20.7 Custodian’s and Tribe’s Rights to Intervene in Proceedings	439
20.8 Emergency Removal of Indian Child From Home	439
20.9 Requirements for Involuntary Foster Care Placements	440
20.10 Preferred Placements of Indian Children	441
20.11 Required Procedures to Involuntarily Terminate Parental Rights	444
20.12 Expert Witness Testimony	445

20.13 Requirements for Voluntary Foster Care Placement or Consent to Termination of Parental Rights	446
20.14 Invalidation of State Court Action for Violation of the Indian Child Welfare Act	447

Appendix: FIA *Services Manual*, CFF 742 and 744

Appendix: Bureau of Indian Affairs, *Guidelines for State Courts; Indian Child Custody Proceedings*

Chapter 21: Appeals 449

21.1 Special Time Requirement for Rehearings Following Termination of Parental Rights	449
21.2 Court Rules Governing Appeals in Child Protective Proceedings	449
21.3 Appeals to the Michigan Court of Appeals	450
21.4 Filing Requirements	451
21.5 Delayed Appeals	454
21.6 Standards of Review	454
21.7 Collateral Attack of Jurisdiction	455
21.8 Stay of Orders	456

Chapter 22: Family Division Records 457

22.1 Family Division Records	457
22.2 Access to Confidential Files	459
22.3 Records of Proceedings in Family Division.....	461
22.4 Access to Records of Closed Protective Proceedings by Persons With a Legitimate Interest ..	461
22.5 Destruction of Family Division Records and Files	462

Subject Matter Index	463
Citation Index	475
Case Citation Index	483